

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GRAHAM CHASE ROBINSON,

Plaintiff and Counterclaim Defendant,

-against-

ROBERT DE NIRO,

Defendant,

and

CANAL PRODUCTIONS, INC.,

Defendant and Counterclaim Plaintiff.

19-CV-09156 (LJL)

VERDICT FORM

PLEASE FOLLOW ALL INSTRUCTIONS,
CHECK (✓) YOUR ANSWERS, AND FILL IN THE BLANKS

All Answers Must Be Unanimous

I. Ms. Robinson's Claims Against Mr. De Niro and Canal

Liability (Gender Discrimination)

1. Do you find that Mr. De Niro is liable for gender discrimination against Ms. Robinson?

YES _____ NO ✓

Regardless of how you answered Question 1, proceed to Question 2.

2. Do you find that Canal is liable for gender discrimination against Ms. Robinson?

YES ✓ NO _____

If you answered YES to either Question 1 or 2 proceed to Question 3.

If you answered NO to both Questions 1 and 2, proceed to Question 4.

Damages (Gender Discrimination)

3. How much money, if any, should Ms. Robinson be awarded for non-monetary and monetary damages?

Answer in Dollars and Cents: \$ 632,142.86

Regardless of how you answered Question 3, proceed to Question 4.

Liability (Retaliation)

4. Do you find that Mr. De Niro is liable for retaliation against Ms. Robinson?

YES _____ NO ☒

Regardless of how you answered Question 4, proceed to Question 5.

5. Do you find that Canal is liable for retaliation against Ms. Robinson?

YES ☒ NO _____

*If you answered YES to either Question 4 or 5, then proceed to Question 6.
If you answered NO to both Questions 4 and 5, proceed to Question 7.*

Damages (Retaliation)

6. How much money, if any, should Ms. Robinson be awarded for non-monetary and monetary damages?

Answer in Dollars and Cents: \$ 632,142.86

Regardless of how you answered Question 6, proceed to Question 7.

II. Canal's Counterclaims Against Ms. Robinson

Liability

7. Do you find that Ms. Robinson is liable for conversion of Canal's SkyMiles?

YES _____ NO ☒

Regardless of how you answered Question 7, proceed to Question 8.

8. Do you find that Ms. Robinson is liable for breach of fiduciary duty against Canal?

YES _____ NO ✓ _____

Regardless of how you answered Question 8, proceed to Question 9.

9. Do you find that Ms. Robinson is liable for breach of the duty of loyalty against Canal?

YES _____ NO ✓ _____

Regardless of how you answered Question 9, proceed to Question 10.

Damages

10. If you answered "Yes" to Question 7, how much money, if any, should Canal be awarded on Canal's claim for conversion as monetary damages?

Answer in Dollars and Cents: \$ _____

Regardless of how you answered Question 10, proceed to Question 11.

11. If you answered "Yes" to Question 8, how much money, if any, should Canal be awarded on Canal's claim for breach of fiduciary duty as monetary damages?

Answer in Dollars and Cents: \$ _____

Regardless of how you answered question 11, proceed to Question 12.

12. If you answered "Yes" to Question 9, during what date(s) or date range(s) from August 17, 2016, to April 6, 2019, if any, do you find that Ms. Robinson was in violation of her duty of loyalty and should be ordered to repay her salary to Canal? (If none identified, write NONE.)

List Date(s) or Date Range(s) (include day/month/year):

*If you answered NONE to Question 12, proceed to the Signatures page.
Otherwise, proceed to Question 13.*

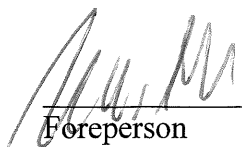
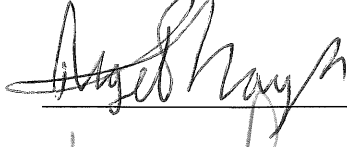

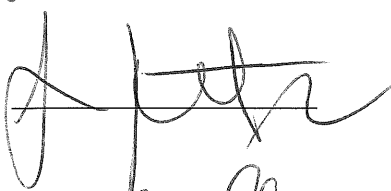



13. For any period of time that you identified in response to Question 12, how much salary was Ms. Robinson paid that you find she should be ordered to repay to Canal?

Answer in Dollars and Cents: \$ _____

Regardless of your answer, proceed to the Signatures page.

III. Signatures

After completing the form, each juror who agrees with this verdict must sign below:

 _____ Foreperson	 _____ Juror	 _____ Juror
 _____ Juror	 _____ Juror	 _____ Juror
 _____ Juror	_____ Juror	

Dated: NOVEMBER 9, 2023